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September 3, 2019

His Royal Highness Prince Andrew, Duke of York

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HRH Prince Andrew:

We were pleased to see your recent statement that you were appalled by the predatory sexual behavior of your friend, Jeffrey Epstein.

We have also read various claims by you that certain statements made by our client, Virginia Roberts Giuffre, are untrue. In the past, in light of similar denials, we requested an interview with you during which lawyers representing various victims of Mr. Epstein, including lawyers representing Ms. Giuffre, would ask you questions about your relationship with Mr. Epstein. This would, of course, allow you to fully respond in a dignified manner and appropriate setting that would, we believe, clarify the record for everyone's benefit, including your own.

While your recent press statements indicate your sincere desire to help the victims of sexual abuse, we are concerned that certain statements attributed to you (which we hope do not reflect your actual views) are quite inconsistent with a desire to deal responsibly with the serious allegations that have been made. We now see, for instance, a troubling assertion attributed to you that a well-documented photograph depicting you, Virginia Roberts Giuffre, and Ghislaine Maxwell in each other's company is a "fake."

As you know, counsel in related litigation delivered correspondence to you years ago asking for an opportunity to discuss the circumstances surrounding this long-held photograph. We were puzzled and, we must admit, disappointed that you did not cooperate at that time. Nevertheless, given your new attention to the subject and your pledge to cooperate, we renew our request for your cooperation.

While it is true that certain public denials and assertions on your part concerning our client, Virginia Giuffre, are hurtful to her, we wish to assure you that we will proceed with the utmost respect as we explore your relationship with Mr. Epstein, Ms. Maxwell, and Ms. Giuffre.

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We are prepared to host a meeting with you in New York, or we will gladly come to London or to any other place you may designate. We do request, however, that we receive the courtesy of a reply to this letter and that our proposed meeting take place at your earliest convenience.

Very truly yours,



EDWARDS POTTINGER LLC
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